high / Med
CAD 008 314 908
SA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

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MEMORANDUM

DATE: July 6, 1992

SUBJECT: Preliminary Assessment Review

Facility: Solar Turbines, International PA date: 4/30/91

FROM: Ray Saracino

TO: Karen Schwinn
Chief, Waste Compliance Branch

THROUGH: Alisa Greene
Chief, Corrective Action Section

I. FACILITY DESCRIPTION

Facility Name: Solar Turbines International

Address: 2200 Harbor Drive
San Diego, CA 92138

EPA ID Number: CAD 008 314 908

DTSC Region (if CA): 4

RWQCB Region (if CA): 9

A. Brief Description of Facility Operations and Hazardous Waste Management:

Solar Turbines International (Solar) manufactures components used in the assembly of gas turbine engines. These engines, along with boost compressor pumps are relied upon to "step up" the pressure in oil transportation pipelines. The Solar facility consists of numerous buildings housing manufacturing, assembling, supporting and administrative functions.

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Wastes generated by the facility are primarily from the three main processes of metal fabrication, metal machining and metal processing:

- Metal shavings and grindings
- Waste coolants and oils
- Various liquid acid wastes
- Sodium hydroxide and zinc phosphate liquid wastes
- Plating and painting wastes
- TCA sludge (from TCA distillation units).

B. SWMU Release Inventory:
The following is a table of Solid Waste Management Units (SWMUs) releases and release potential to the various media. Releases are described with either a "D" for Documented, a "V" for Visual, or a "P" for Potential. Potential releases are further characterized as "H," "M," or "L" for High, Medium and Low. RCRA-regulated units are starred with an asterisk.

SWMU TABLE

SWMU #	Name	Soil	GW	SW	Air
* 1	Hazardous Waste Storage Yard				
2	TCA Degreasers (6 separate units)				
* 3	TCA Distillation Unit				

Note: SWMU #3 has received and distilled waste TCA from another Solar facility. As a result, it appears that this unit is RCRA regulated.

AOC TABLE

AOC #	Name	Soil	GW	SW	Air
4	Chemical Process Area				
5	USTs	D	D	P-h	

II. ENVIRONMENTAL SIGNIFICANCE:

A. Hazardous Waste Exposure and Constituent Information Instructions:

1. Designate as appropriate: D - documented evidence (e.g. analytical data), V - visual evidence (e.g. observed spills, stained soils, etc.), P -potential for

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release (e.g. past waste management practices suggest probable releases, known soil contamination has probably caused groundwater contamination, etc.). Specify documentation, who saw visual evidence, and/or rationale for potential release, if known.

2. Provide released or potentially released listed waste or constituent information to each appropriate media. Include volume of waste released, if known, toxicity (using toxicity table), and physical state of contaminants (e.g. gas, liquid, sludge, stable solid).

3. Indicate whether release has already been remediated.

4. Stabilization is appropriate if:
   a. there are actual or imminent exposure threats to humans or ecosystems at levels of concern;
   b. inexpeditiously addressed releases will result in further significant contamination; or
   c. site characteristics suggest that the site may be amenable to control or abatement of imminent threats.

• Stabilization may be appropriate to remove all sources of contam. It is not certain if all USTs have been removed.

_____ Imminent danger to public health/environment. Immediate action required; explain:

__X__ Stabilization measures may be appropriate; explain:

__X__ Release to soil. D V P

Many of the original 31 onsite USTs have leaked and released various hydrocarbons into the soils. Heavy oil petroleum hydrocarbons and fuel hydrocarbons were detected at concentrations as high as 5,800 mg/kg and 120,000 mg/kg respectively. VOCs detected include benzene, toluene, and xylene. Concentrations of chlorinated organics have also been detected.

__X__ Release to groundwater. D V P-h

The leaking USTs have been visually observed (during removal) to be in contact with groundwater which occurs at approximately 10 feet bgs. However, due to the proximity of the site to the San Diego Bay (300 feet) the ground water is not a source of drinking water. Donn Lipera (see Section V. A.) of the San Diego Co. Health Dept. informed me that recent ground water quality data from the site revealed vinyl chloride at 26,000 ug/l and TCE at 16,000 ug/l.

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__X__ Release to surface water. D V P-h

Again, due to the proximity of the site to the bay (300 feet), there is a high potential for the leaking USTs to impact the bay.

_____ Release to air. D V P

__X__ High Potential for Migration (media: Soil, SW, GW)

__X__ Sensitive environmental receptors onsite or within 4 miles (endangered species, wetlands, etc.) Explain:

San Diego Bay provides habitat for the following threatened or endangered species:

- California black-tailed gnatcatcher
- snake cholla
- Orcutt's spineflower
- salt marsh birds beak.

_____ No releases

Extent of Site Characterization (check one):

_____minimal __X__extensive _____unknown

The areas which formerly contained the USTs have been extensively characterized under the oversight of the DTSC.

B. **Exposure Considerations:** (D - Documented, P - Potential) Skip this section if there is no potential or documented release.

1. Groundwater (GW): If potential exposure is a concern, please specify whether release is "highly suspected" (HS). A highly suspected release to groundwater means that there is known soil contamination from a large volume of mobile constituents with high migration potential where there is no known aquiclude between contaminated soil and ground water.

__no__ Current GW drinking water source impacted

__no__ Sole Source (Class I) aquifer impacted

__no__ Impacts on potable water aquifer but not currently used as drinking water

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Depth to GW 10' GW flow direction west during low tide and south-west during high tide

Direction/Distance to nearby wells unknown

Population Served unknown

2. Surface Water (SW):

no SW drinking water source impacted

Direction/Distance to SW 300 feet west

300' Distance to sensitive environment related to SW contamination

300' Distance to drinking water supply intake or contact point

Net Precipitation unknown 24 hour rainfall unknown

Permitted outfall no Permit Violations

unknown Flood prone area unknown 100-yr flood plain

potentially Fishing, recreation water source impacted

no Irrigation, livestock water source impacted

The following near coastal waters and Estuary factors should not be considered in the initial staff prioritizing process. The information will be considered by management with the recommendation.

Check if contamination affects any of the following near coastal waters:

_____ Apra Harbor (Guam)
_____ Babelthaup Island Bays (Palau)
_____ Kaiaka Bay (Hawaii)
_____ Kailua Bay (Hawaii)
_____ Kona Coast (Hawaii)
_____ Morro Bay (California)
_____ Pago Pago Harbor (American Samoa)
_____ Pearl Harbor (Hawaii)
X San Diego Bay (California)
_____ Tijuana Estuary (California)

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Check if contamination affects either of these Estuary projects:

_____ San Francisco Bay/Delta
_____ Santa Monica Bay

3. Air:

no Blowing dust; nearby population

yes Air permits unknown Permit violations

no Can contaminants migrate into air?

unknown Target Population < 4 miles (# and distance)

4. On site:

Accessibility: inaccessible X
limited access _____
poor security _____

no Observed surface soil contamination

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III. SITE ENVIRONMENTAL PRIORITY

Instructions: Assign priority based on technical considerations only. Final priority should be briefly explained in terms of potential exposure to human health and the environment based on the technical considerations in Sec. II.

_____ High Priority

* Known or highly suspected release which has resulted in, or which has high potential for, exposure to human population and sensitive environments (other than near coastal waters and estuary project sites), in the short term (< 10 years). Choose this priority if there is known or highly suspected contamination to a sole source aquifer currently being used.

__X__ Medium Priority

* Known or highly suspected release with potential for exposure to human health and sensitive environments (other than near coastal waters and estuary project sites) in the long term (> 10 years).

_____ Low Priority

* Known or highly suspected release, but unlikely adverse effect on human health and the environment.

_____ No Further Action

* No evidence of a release that could adversely affect human health and the environment.

__X__ NCAPS Priority High <u>Medium</u> Low

* Check if NCAPS has been completed and underline appropriate NCAPS-based priority. If the NCAPS-based priority does not agree with your assessment of priority, discuss below.

Comments/Rationale to support priority:
Without considering the potential impact to the San Diego Bay, there is still the potential for the 520 on-site workers to be exposed to air emissions from the contaminated soil/groundwater. The known areas of soil contamination are reportedly covered with asphalt however, subsurface migration of contaminants and subsequent volatilization could lead to exposure in the long term via the air pathway. Contaminants include benzene and vinyl chloride.

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IV. RCRA PERMITTING STATUS

A. Contact Person(s):

#	Name	Contact Date	Phone	Agency
1				EPA-Permits
2	Ron Okuda	7/6/92	(310) 590-4885	DTSC
3				RWQCB
4				Other

B. Current Status (mark all applicable):
Instructions: For source, indicate file document or numeral for contact person listed above.

__X__ Operating RCRA TSDF; Source: PA

_____ Not Operating RCRA TSDF; Source:

_____ Bankrupt Facility; Source:

_____ Non-Notifying TSDF - should be a RCRA TSDF but didn't submit a Part A permit application. Source:

_____ Generator only - never operated as a TSDF. Source:

__X__ Permitted TSDF or Seeking Permit; Source: PA

Date Permitted: 7/24/87 Agency: DHS

Part B Permit Application Submitted? Y N

Permit Application Review Lead (circle)
EPA STATE- DTSC OTHER (specify)

Corrective Action in (draft) Permit? Y N

Expected Permit Issuance Date:

Permit Expiration Date: 7/24/92

Permit Renewal Application Submitted Y* N

* According to Ron Okuda, DTSC, the facility has withdrawn their permit renewal application and desires to undergo closure.

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(Expected) Renewed Permit Issuance Date:
Renewed Permit Expiration Date:

__X__ Closed or Closing Facility; Source: 2

Closure Plan Submittal (Expected) Date: unknown

Closure Plan Review Lead (circle all applicable):
EPA STATE-DTSC OTHER (specify)

Closure Plan Approved? Y N Date:

Closure Certification Received? Y N

Clean Closed? Y N

Closure Certification accepted by EPA/DTSC? Y N

_____ Post-Closure permit; Source:

Post-Closure Permit Application Submitted?
Y N

Post-Closure Permit Application Review Lead
EPA STATE Other (specify)

Corrective Action in (draft) Permit Y N NA

(Expected) Post-Closure Permit Issuance Date:

_____ Combination: some units closing, some seeking permit (i.e. partial closure). Source:
Explain:

_____ Part A Withdrawal Candidate; Source:
Explain:

_____ RWQCB Waste Discharge Requirements requiring investigation and/or remediation in Effect (CA only)

Other Comments:

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V. OTHER REGULATORY ACTIVITIES RELEVANT TO CORRECTIVE ACTION

A. Contact Person(s):

#	Name	Contact Date	Phone	Agency
6				EPA-Enforc
7				EPA CERCLA
8				DTSC-Enforc
9	Ron Okuda	7/6/92	(310) 590-4885	DTSC-Permits
10	Jim Munch		(619) 265-5114	RWQCB
11	Donn Lipera	7/6/92	(619) 338-2244	County Health Dept.

B. Activity

Instructions: mark all applicable; note any pertinent outstanding violations.

_____ EPA Enforcement Action with Activities Relevant to Corrective Action; Source:
Date:
Explain:

_____ State Enforcement Action with Activities Relevant to Corrective Action; Source:
Date:
Explain:

_____ Regional Water Board Order or WDR Requiring Corrective Action (CA only); Source:
Date:
Explain:

__X__ Other Agency Enforcement Action with Activities Relevant to Corrective Action; Source: 9, 11
Date: 7/6/92
Explain: Three agencies are currently involved with this site. DTSC is involved because the facility wishes to undergo closure of its RCRA regulated units. San Diego County Health Department and RWQCB are involved because of past releases to the ground water from USTs. San Diego County Health Department (the county) is the lead agency for corrective action at the facility.

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VI. OVERALL STATE LEVEL OF INVOLVEMENT IN CLEAN-UP ACTIVITIES (based on state actions, level of state staff person's oversight)

Mark one:

__X__ High _____ Medium _____ Low _____ None

Rationale: The county is actively involved with the site and is reviewing all submittals. The RWQCB has a strong working relationship with the county and has essentially deferred their oversight to the county.

VII. FACILITY WILLINGNESS/ABILITY TO PERFORM CORRECTIVE ACTION

__X__ Facility is cooperative

_____ Facility is uncooperative; Explain:

_____ Unknown

_____ Facility may be financially unable to complete work. Explain:

Other Comments:

VIII. RECOMMENDATION FOR FURTHER ACTION (mark all applicable)

Instructions: Consider factors in Sections I - VII to arrive at final recommendation for further action. If several actions are recommended, prioritize as Action 1, 2, etc.

_____ Imminent and substantial danger to human health or the environment requires issuance of RCRA 7003 Order and/or CERCLA 106 Order.

__X__ Stabilization evaluation completed

- _____ Stabilization required
- _____ Stabilization not required
- _____ Stabilization not feasible
- __X__ Further investigation necessary (to determine need/feasibility of stabilization)

_____ Issue RCRA 3013 order. Release of hazardous waste presents a substantial hazard to human health or the environment (investigation only).

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_____ Refer to CERCLA for further follow-up.

_____ Facility unwilling or unable to perform corrective action (explain in Section VII)

_____ Other (e.g. mining waste, active Superfund site, generator only, etc.)
Specify:

__X__ No further CERCLA action

_____ Conduct an RFA

_____ as prelude to expected corrective action order

_____ as prelude to permit issuance

_____ Use a 3007 letter to obtain more information regarding the following items (a subsequent recommendation must be made after the information is received):

__X(3)?__ Negotiate 3008(h) Consent Order
- Must have documented or probable release of hazardous wastes or constituents
- Must be a RCRA TSDF that has interim status (i.e. not yet permitted, including illegal TSDF that should have had interim status.
- For California, must not have a permit issued by DTSC between 1/13/83 and 11/8/84. Permits issued by DTSC between 11/9/84 and 1/31/86 are considered partial RCRA-equivalent permits; with respect to corrective action, facilities permitted between 11/9/84 and 1/31/86 have interim status.

__X(4)?__ Incorporate corrective action into post-closure permit through 3004(u) and (v).

_____ Incorporate corrective action into permit through 3004(u) and (v).

_____ Include corrective action in closure plan (appropriate only for surface soil releases near regulated units)

__X(1)__ Ongoing or planned State action is sufficient to address release(s). Defer to state or other agency lead (identify): San Diego Co. Health Dept. for corrective action; DTSC for closure.

__X(2)__ No further RCRA action at present; re-evaluate next year.

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_____ No further RCRA action.

_____ Other (specify):

Comments:

Actions 1 and 2 are self-explanatory. Actions 3 and 4 have question marks next to them due to the potential for the releases at the facility to have come entirely from **product** storage tanks. Should the ground water contamination have resulted entirely from leaking **product** storage tanks, then both actions 3 and 4 are inapplicable and RCRA Corrective Action does not have jurisdictional authority. If the ground water contamination can be found to have resulted at least partially from a regulated unit or waste storage tank, then DTSC should be contacted concerning the status of the facility's closure activities and action 3 or 4 should be pursued as appropriate.

(unless leaks can be considered "systematic & routine").

✓ Recommendation Accepted

Karen Schwinn 8/29/92

Karen Schwinn
Chief
Waste Compliance Branch

Environmental Benefits:

Raise priority to High due to near coastal waters impacts.

Raise priority to _____ due to estuary project impacts.

When applicable, entity to perform RFA:

_____ State

_____ FIT (CERCLA)

_____ contractor (RCRA)

_____ Other; specify:

cc: Nancy Nadel, EPI Coordinator, H-4-4

FOR

SOLAR TURBINES INTERNATIONAL

EPA SITE NUMBER: CAD 008 314 908

SAN DIEGO, CA

SCORED BY: RAY SARACINO

OF USEPA REGION IX

ON 07/06/92

GROUNDWATER SCORE	:	0.00
SURFACE WATER SCORE	:	47.27
AIR ROUTE SCORE	:	23.79
ONSITE SCORE	:	0.00
MIGRATION SCORE	:	26.46

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? Y

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : NA

NET PRECIPITATION (IN.) : NA

PHYSICAL STATE: NA

CONTAINMENT:

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: VINYL CHLORIDE

TOXICITY/PERSISTANCE VALUE: 15

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS:		0
DRUMS	:	0

AMOUNT IS LIKELY TO BE LARGE

TARGETS

GROUNDWATER USE: QUALITY IMPACTED

DISTANCE TO WELL (MILES): 4.0

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? N

IS THERE A PERMITTED OUTFALL? N

HAVE THERE BEEN PERMIT VIOLATIONS? N

ROUTE CHARACTERISTICS

FACILITY LOCATION: OTHER

24-HOUR RAINFALL: 3.0

DISTANCE TO SURFACE WATER (MILES): 0.06

PHYSICAL STATE: LIQUID, GAS, SLUDGE

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: VINYL CHLORIDE

TOXICITY/PERSISTANCE VALUE: 15

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0
DRUMS : 0

AMOUNT IS LIKELY TO BE LARGE

TARGETS

SURFACE WATER USE: POSSIBLE DRINKING WATER OR RECREATI

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 0.1

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 0.1

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N

DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? Y

HAVE THERE BEEN ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY

CAN CONTAMINANTS MIGRATE INTO AIR? Y

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: BENZENE

TOXICITY/PERSISTANCE VALUE: 3

QUANTITY KNOWN? NO

CUBIC YARDS OR TONS: 0
DRUMS : 0

AMOUNT IS LIKELY TO BE LARGE

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 0.1

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: INACCESSIBLE

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? N

CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: BENZENE

TOXICITY/PERSISTANCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.50

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: N

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Ray Saracino
Date: 7/16/92

Background Facility Information

Facility Name: Solar Turbines
EPA Identification No.: CAD 008 314 908
Location (City, State): San Diego, CA
Facility Priority Rank: Medium (NCAPS)

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

entire facility

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

   (X) No corrective action activities initiated
   ( ) RCRA Facility Assessment (RFA) or equivalent completed
   ( ) RCRA Facility Investigation (RFI) completed
   ( ) Corrective Measures Study (CMS) completed
   ( ) Corrective Measures Implementation (CMI) begun or completed
   ( ) Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

   ( ) Operating permit
   ( ) Post-closure permit
   ( ) Enforcement order

N/A

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

   ( ) Yes
   ( ) No
   ( ) Uncertain; still underway

N/A

CONTINUE TO QUESTION 5 <u>ONLY</u> IF THE FOLLOWING CONDITIONS ARE MET:

- *The facility ranks "High" on the National Corrective Action Prioritization System; <u>AND</u>*
- *Interim Measures have not been initiated, or if initiated, have not been successful in preventing the further spread of contamination at the facility.*

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

   (X) Ground water
   (X) Surface water
   ( ) Air
   (X) Soils

6. Are contaminant releases migrating off-site?

( ) Yes; Indicate media, concentrations, and level of certainty.

uncertain

( ) No
(X) Uncertain

7a. Are humans currently being exposed to contaminants released from the facility?

( ) Yes
(X) No
( ) Uncertain

7b. Is there a potential for human exposure to the contaminants released from the facility over the next five to 10 years?

(X) Yes
( ) No
( ) Uncertain

8a. Are environmental receptors currently being exposed to contaminants released from the facility?

( ) Yes
( ) No
(X) Uncertain

8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next five to 10 years?

(X) Yes
( ) No
( ) Uncertain

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

( ) Yes
( ) No
( ) Uncertain

Additional explanatory notes:

final C/A measures not identified

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

( ) Yes
( ) No
(X) Uncertain

Additional explanatory notes:

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

( ) Yes
( ) No
(X) Uncertain

Additional explanatory notes:

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions?

( ) Solid
(X) Light non-aqueous phase liquids (LNAPLs)
(X) Dense non-aqueous phase liquids (DNAPLs)
(X) Dissolved in ground water or surface water
( ) Gaseous
( ) Other _____

13. Are one or more of the following major chemical groupings of concern at the facility?

(X) Volatile organic compounds (VOCs) and/or semi-volatiles
( ) Polynuclear aromatics (PAHs)
( ) Pesticides
( ) Polychlorinated biphenyls (PCBs) and/or dioxins
( ) Other organics
( ) Inorganics and metals
( ) Explosives
( ) Other petroleum hydrocarbons

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

( ) Yes; Indicate possible course of action.

_____
_____
_____

( ) No; Indicate why stabilization technologies are not appropriate; then go to Question 19.

_____
_____
_____

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

(X) Yes, possibly
( ) No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

( ) Yes
( ) No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

( ) Yes
( ) No
(X) Uncertain

Additional explanatory notes:

_____
_____
_____

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

( ) Yes
( ) No
(X) Uncertain

Additional explanatory notes:

_____
_____
_____

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

( ) Yes
( ) No, not feasible
( ) No, not required
(X) Need information

Explain final decision, using additional sheets if necessary.

Site assessment data has been collected by the Co. Health Dept and RWQCB but was not obtained for this review. It appears that all USTs have been removed, it is not certain ~~whether~~ if further stabilization measures are needed/feasible.